

Exhibit R-1



Case No. 3:25-cv-01885-VC, Porth v. Payward

From Pallen, Kimberly <Kimberly.Pallen@withersworldwide.com>

Date Thu 5/29/2025 8:45 PM

To L P <lhkc_25@outlook.com>

Cc Mesropyan, Vahe <Vahe.Mesropyan@withersworldwide.com>; Lodovice, Barbara <Barbara.Lodovice@withersworldwide.com>

 1 attachment (97 KB)

16034026_3_DRAFT Joint Case Management Statement.docx

Dear Ms. Porth,

Attached please find a draft joint case management statement and [proposed] order. While Defendants are aware you have already submitted a unilateral statement, please review and let us know if you agree with what we proposed in the joint case management statement. If you have a different view, please provide your different view in the attached document and send it back to us as soon as possible, so we can file this tomorrow.

Further, the initial case management conference is scheduled for June 6, next Friday. We have previously asked for your stipulation to extend this date, but you have not provided us a response to that. Can you please let us know if you will stipulate to the extension of the case management conference until after the hearing on Defendants' Motion to Dismiss and Strike (ECF No. 15)? If not, Defendants will file a motion seeking to extend the case management conference until after the Court hears the Motion to Dismiss and Strike.

In the event that the case management conference is not moved, can you please provide us with the names of those who will be appearing at the case management conference before 12:00PM tomorrow? This is a requirement pursuant to the Court's order. (See ECF No. 9 ("Advanced notice is required of counsel or parties who wish to be identified by the court as making an appearance or will be participating in the argument at the hearing. One list of names of all counsel appearing for all parties must be sent in one email to the CRD at vccrd@cand.uscourts.gov no later than Friday, May 30, 2025, by no later than 12:00PM.").)

Please feel free to call us with any questions. Thank you.

Best,

Kimberly Pallen

Partner

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